

## Exhibit A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

PGI POLYMER, INC.,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC.  
KARMIN GROUP a/k/a Le GROUPE  
KARMIN,  
KARMIN INDUSTRIES,  
LAMI PRODUCTS, INC. and  
BI-LO, LLC,

Defendants.

Civil Action No.:  
3:15-CV-0214 (FDW)(DSC)

**DECLARATION OF JEFFREY A. LINDENBAUM**

I, Jeffrey A. Lindenbaum, declare as follows:

1. I am a partner of the law firm Collen IP, counsel for Defendants Church & Dwight Co., Inc., Karmin Group a/k/a/ Le Groupe Karmin, Karmin Industries, and Lami Products, Inc. in the above-captioned action. I submit this declaration in support of Defendants' Opposition to Plaintiff's Motion for Leave to File Second Amended Complaint. The facts set forth in this Declaration are personally known to me and I have firsthand knowledge thereof. If called as a witness, I could and would competently testify to all facts within my personal knowledge.

2. In response to Plaintiff's request for information regarding entities involved in the chain of distribution of alleged infringing goods at issue in this matter, I disclosed the names of Boscov's Department Stores, LLC, Delhaize America, LLC, Lami Products, Inc., Regent Products Corp., and X-S Merchandise, Inc. to Plaintiff on August 19, 2015.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 2, 2015  
New York

s/ Jeffrey A. Lindenbaum  
Jeffrey A. Lindenbaum